

Federal Defenders  
OF NEW YORK, INC.

David E. Patton  
Executive Director

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Jennifer L. Brown  
Attorney-in-Charge

September 8, 2021

**BY ECF**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Franklin Hernandez a/k/a Tomala  
21 Cr. 367 (AJN)**

Dear Judge Nathan,

I write to respectfully request that the Court adjourn the motions schedules in the above-captioned case for approximately two weeks. Specifically, we ask that defense motions be due September 24, 2021, government oppositions due October 22, 2021, and replies due November 5, 2021. In addition, we ask that you postpone the deadline for the government's response to Mr. Hernandez's pending grand jury motion to October 6, 2021.

SO ORDERED.

The parties are engaged in serious plea negotiations and adjourning the motions schedules will enable us to continue those conversations without further litigation. The requested schedule adjustment will not interfere with the trial date that is tentatively scheduled for January 24, 2022.


The government, by Assistant United States Attorney, requests this

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine  
Assistant Federal Defender

  
SO ORDERED. 9/9/21  
ALISON J. NATHAN, U.S.D.J.